

Information on regulation (EC) No 1907/2006 (REACH)

Substances of very high concern (SVHCs) from the candidate list

Speaking in terms of REACH the products manufactured and distributed by CMC Klebetechnik GmbH are defined as articles. Some of these articles contain substances of very high concern (SVHCs), which can be found on the so-called candidate list.

Art. 33 of the REACH regulation applies to articles containing a substance from the candidate list, and it obligates us to pass information down the supply chain if the following condition is met:

- The substance is included in an amount $> 0.1\%$ (w/w) in the homogenous material.

With this letter we fulfil our obligations. The liability to inform our customers is connected to all CMC products listed in the table below. The information is up to date and accurate to the best of our knowledge. Please note that despite the reporting requirement all below products still **comply with REACH**; our only obligation is to forward information to our customers.

Usually you will receive delivery papers or technical data sheets with remarks concerning REACH which refer to this document. Please check the CMC type number to determine which substance is present in the product you purchase (multiple listings are possible).

This document is valid for the latest update of the candidate list:

- 16.7.2019 (containing 201 entries)

Raw materials provided by our customers are not covered by this statement.

Attached you will also find original statements by DuPont concerning their products Nomex® und Kapton®.



i.V. Michael Renken

development

Overview

CMC products containing substances from the candidate list (> 0.1%):

CMC type	SVHC	CAS number	amount	product description
CMC 10535, CMC 10678, CMC 10745, CMC 10759, CMC 10792, CMC 10814, CMC 10897, CMC 10906, CMC 10917, CMC 10931, CMC 10962, CMC 10972, CMC 12060, MP 1512-023A, MP 1513-025A, MP 1513-025B, MP 1513-025C, CMC 61401, CMC 65772, CMC 70175, CMC 70927, CMC 70960, CMC 70964	1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloro pentacyclo [12.2.1.1.16,9.02,13.05,10] octadeca-7,15-diene ('Dechlorane Plus')	13560-89-9	ca. 28% (w/w) (referring to the heat seal layer)	films with a flame retardant polyester resin coating for heat seal processes, mainly for laminating flexible flat cables (FFCs)
CMC 15603, CMC 15707, CMC 19110, CMC 19708, CMC 19714, CMC 382XX, CMC 65050, CMC 65080, CMC 65120, CMC 65121, CMC 65122, CMC 65123, CMC 65124, CMC 65130, CMC 65180, CMC 65220, CMC 65221, CMC 65222, CMC 65223, CMC 65224, CMC 65227, CMC 65229, CMC 65230, CMC 65250, CMC 65300, CMC 65301, CMC 65380, CMC 65510, CMC 65758, CMC 65772, CMC 65838, CMC 65839, CMC 65842	N,N-Dimethyl acetamide (DMAc)	127-19-5	up to ca. 0.5% (referring to the Nomex® paper)	Nomex® by DuPont, mainly further processed to self adhesive tapes and laminates
CMC 383XX, CMC 70041, CMC 70042, CMC 70043, CMC 70050, CMC 70075, CMC 70076, CMC 70105, CMC 70115, CMC 70125, CMC 70175, CMC 70430, CMC 70810, CMC 70849, CMC 70905, CMC 70906, CMC 70927, CMC 70960, CMC 70968, CMC 70971	N,N-Dimethylacetamid (DMAc)	127-19-5	up to ca. 0.6% (referring to the Kapton® film)	Kapton® by DuPont, mainly further processed to self adhesive tapes and laminates
CMC 35150, CMC 35160, CMC 35166	4-(1,1,3,3-tetramethylbutyl)phenol	140-66-9	up to ca. 0.11% (referring to the complete tape, the substance itself is located in the adhesive layer)	self adhesive tapes based on acetate silk
CMC 70971	Nonylphenol ethoxylate	68412-54-4	up to ca. 3% (referring to the adhesive layer)	self adhesive tape with an acrylic adhesive
3M 3669C, 3M 3690E (= CMC 20100)	2-Ethylhexyl-10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate	15571-58-1	up to ca. 1.9% (referring to the PVC film)	self adhesive tapes based on PVC film

X in the product designation represents digits 0 to 9.

CMC type	SVHC	CAS number	amount	product description
CMC 10430, CMC 10431, CMC 10617, CMC 10623, CMC 10730, CMC 10735, CMC 10739, CMC 10876, CMC 10976, CMC 11712, CMC 12041, CMC 12079, CMC 12082, CMC 12083, CMC 12088, CMC 12092, CMC 12094, CMC 12099, CMC 12100, MP 1216-001B, MP 1217-005A, MP1217-014B & C, MP 1218-007A, MP 1218-011B, CMC 15240, CMC 15603, CMC 15610, MP 2615-002D, CMC 30822, CMC 30823, CMC 481XX, CMC 50739, MP 6516-002D, CMC 70115, CMC 70121, CMC 70122, CMC 70124, MP 7015-003B, CMC 70150, CMC 70160, CMC 70166, CMC 70752, CMC 70849, CMC 70968, CMC 73X3X, CMC 73X6X, CMC 73XX3, CMC 73XX6, CMC 74X3X, CMC 74X6X, CMC 74XX3, CMC 74XX6, MP 7712-003A, MP 7715-003A, MP 7716-001A, MP 7716-002A, MP 7717-001C, CMC 77700, CMC 77701, CMC 77703, CMC 90150	decamethylcyclopentasiloxane, dodecamethylcyclohexasiloxane, octamethylcyclotetrasiloxane	541-02-6, 540-97-6, 556-67-2	0.1 to 3.6% (w/w) per substance (referring only to the adhesive layer)	self adhesive tapes with different silicone adhesive layers Note that for the laminates CMC 481XX only the adhesive layer of the masking tape is concerned.
CMC 15015, CMC 15018, CMC 15025, CMC 15180	lead Corrosion may form lead oxides and carbonates as well.	7439-92-1	ca. 96% (w/w) lead content of the foil	self adhesive tapes based on lead foil
CMC 10976, CMC 15100, CMC 15603, CMC 21729, CMC 30824, CMC 70115, CMC 70121, CMC 70124, CMC 70752, CMC 70849, CMC 77701, CMC 90150	dicyclohexyl phthalate	84-61-7	ca. 1% (w/w) (adhesive layer only)	self adhesive tapes with different silicone adhesive layers

Attachment:

- original statements by DuPont concerning Kapton® and Nomex®

Please note that certain articles like Nomex® or Kapton® 200HN have been optimized so that for DuPont there is no need for downstream communication of SVHCs any more. As long as our articles still contain DuPont materials from older batches those CMC products may still contain DMAc and the obligation to inform our customers still applies.

REACH Compliance

Position of DuPont Circuit & Industrial Technologies for

KAPTON® 300B, 500B, 150EKJ, 200EKJ, 200EKJ-CP, 350ELJ, 300FPC, 500FPC, 300GS, 250GS-C, 275GS-C, 300GS-C, 500GS-C, 250GT, 275GT, 300GT, 350GT, 300H, 500H, 250HN, 275HN, 300HN, 500HN, 300HPP-ST, 500HPP-ST, 300MT, 100MT+, 150MT+, 200MT+, 500MT+, 300PI-H, 500PI-H, 300PI-HB, 500PI-HB, 300PST, 500PST, PV9201, PV9202, 150SAKJ, 200SAKJ, 500VN, 500VN-I, 5005X4M

DuPont is committed to making certain that all DuPont products manufactured in or imported into the European Union area are in compliance with the EU regulations 1907/2006/EC (REACH) and 1272/2008/EC (CLP). Registrations have been completed for all substances¹⁾ due in 2010 and 2013. Additional registrations will be completed before the required date in 2018.

KAPTON® Polyimide Films fulfil the criteria of being articles²⁾. There are no substances intended to be released from these films as defined by article 7(1) under normal or reasonably foreseeable conditions of use.

Under the above conditions articles are exempt from registration under REACH.

To our current knowledge the above listed DuPont CIT products contain the following substance listed on the Candidate list³⁾ of Substances of Very High Concern (SVHC), as published on the ECHA website on 15 January 2018, in an individual concentration of > 0.1 % by weight:

N,N-dimethylacetamide (DMAc), EC 204-826-4, CAS 127-19-5

	DMAC concentration
KAPTON® 300B, 500B, 150EKJ, 200EKJ, 200EKJ-CP, 350ELJ, 300FPC, 500FPC, 300GS, 250GS-C, 275GS-C, 300GS-C, 500GS-C, 250GT, 275GT, 300GT, 350GT, 300H, 500H, 250HN, 275HN, 300HN, 500HN, 300HPP-ST, 500HPP-ST, 300MT, 300PI-H, 500PI-H, 300PI-HB, 500PI-HB, 300PST, 500PST, PV9201, PV9202, 150SAKJ, 200SAKJ, 500VN, 500VN-I, 5005X4M	0.1% - 0.3%
KAPTON® 100MT+, 150MT+, 200MT+, 500MT+	0.3 – 0.6 %

Results from product evaluations show that DMAc is not released at detectable levels under ambient temperatures. Estimated exposures to downstream workers handling the above DuPont CIT products and the general public from use of the final products, are all well below the levels of concern.

To our current knowledge the above listed DuPont CIT products do neither contain any substance listed on REACH Annex XIV nor on Annex XVII above the applicable declaration limits.

To understand fully the obligations under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>

DuPont REACH web site: <http://reach.dupont.com>

Sincerely,



Olaf Niber
Regulatory/Product Stewardship Consultant
Electronics & Imaging Europe

DuPont de Nemours (Luxembourg) Sàrl
Circuit & Industrial Technologies
L-2984 Luxembourg
Tél. (+352) 3666-1



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- 1) Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (REACH, Art. 3.1).
- 2) Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (REACH, Art. 3.3).
- 3) http://echa.europa.eu/chem_data/candidate_list_table_en.asp

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REACH Compliance

DuPont for NOMEX®

Categories: Paper, Pressboard, Floc and Fibrils

META-ARAMID FIBERS

At DuPont, Product Stewardship is an important aspect of our supply chain relationships. We maintain an unwavering commitment to safety for our employees, our contractors, and the communities in which we operate and we share that concern for all who handle our products. As both a manufacturer and importer/exporter of substances¹ covered under REACH, DuPont has established a team to address all of the requirements as they apply to our suppliers, our customers, and our own operations.

The purpose of this communication is to inform you of our current plans:

- DuPont is ensuring that all products sold to our EU and EEA customers by DuPont legal entities in Europe² are in compliance with REACH regulatory requirements, including (pre-)registration³.
- DuPont does not intend to communicate REACH pre-registration numbers based on guidance in CEFIC REACH Industry Preparation Letter No 9.

REACH requires registration for individual substances (on their own or in preparations⁴) greater than 1 metric ton per year produced or imported.

Each importer is responsible for its own compliance with REACH.

The products mentioned above, in our opinion, fulfil the criteria of being classified as "articles"⁵. There are no substances intended to be released from these products under normal or reasonably foreseeable conditions of use⁶.

The above articles sold by DuPont under NOMEX® and formed after July 2016 to our current knowledge do not contain substances above the legal threshold that are on the 'Candidate List' of Substances of Very High Concern (SVHC) as published on the ECHA website - latest on 15-01-2018.

In early 2016, DuPont finished the implementation of a process technology upgrade to Nomex® fiber production equipment that improved the fiber washing process, reducing the residual content of ,N-dimethylacetamide (DMAc) EINECS 204-826-4 to less than 0.1 % (w/w). As a result, Nomex® paper and pressboard made from these fibers does not exceed the REACH threshold for notification. The transition can be marked using the roll numbers below based on the first two digits:

C1	C134004XXX	C4	C481000XXX	F1	F178162XXX
C2	C243140XXX	C5	C522045XXX	F2	F277263XXX
C3	C350269XXX				

Under the above conditions, articles are exempt from registration under REACH.

To our current knowledge, all substances contained in the above articles are in compliance with the conditions of restrictions of REACH Annex XVII. DuPont will communicate in due course any changes due to future amendments of Annex XVII that may impact the manufacture, placing on the market or use of the substances contained.

To understand fully the obligations that you will have under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>

DuPont REACH web site: <http://reach.dupont.com>

Sincerely,


Pablo Blanco
Regulatory/Product Stewardship Analyst
DuPont Safety & Construction EMEA

DuPont Asturias, S.L.
Valle de Tamón - 33469 Carreño
Principado de Asturias (Spain)
Email: pablo.blanco-martinez@dupont.com

¹ Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (REACH, Art. 3.1).

² This includes the DuPont legal entities in the EU/EEA, as well as, DuPont de Nemours International S.A. and DuPont International Operations Sàrl.

³ DuPont, for its products and brands, has submitted (pre-)registration files to ECHA for the substances requiring (pre-)registration that are manufactured/imported by DuPont. Receipt of those files has been acknowledged by ECHA. As per today's knowledge, the substances that DuPont is purchasing on the European market have been (pre-)registered by their respective manufacturers or importers.

⁴ Preparation: means a mixture or solution composed of two or more substances (REACH, Art. 3.2).

⁵ Article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (REACH, Art. 3.3).

⁶ As per REACH Art. 7.1 b.

This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.



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